

File #16537/DPK  
E-Case #638

**STATE OF MINNESOTA  
COMMISSIONER OF COMMERCE**

In the Matter of  
Renee Marie Brown  
Securities Agent License CRD No. 3221618  
and  
Insurance Producer License #20210575

**CONSENT ORDER**

TO: Renee Marie Brown  
516 Cloverleaf Drive  
Golden Valley MN 55422

The Commissioner of Commerce Mike Rothman (hereinafter "Commissioner") has advised Renee Marie Brown (hereinafter "Respondent") that he is prepared to commence formal action against Respondent's securities agent license and insurance producer license based on violations of Minnesota Statutes.

1. Respondent was one of three principals who founded Wildwood Wealth Management, LLC ("Wildwood") in October 2001 and served as its chief manager. Wildwood is a Minnesota based investment adviser registered with the United States Securities & Exchange Commission ("SEC"). Wildwood terminated Respondent on March 17, 2010, for misappropriation of client funds.

2. Respondent was a registered representative associated with CapitalQuest Securities, Inc., from June 5, 2005, until she was terminated for cause on March 11, 2010, for failing to follow firm policies and violation of industry rules.

3. Respondent created her own investment advisory business called Aaria Capital Inc., which was incorporated as a Minnesota corporation on December 23, 2009. Aaria Capital Inc. was not registered with the SEC in any capacity and was not registered with the Minnesota Department of Commerce as an Investment Adviser. On July 1, 2009, Respondent organized Investors Income Fund X, LLC ("the Fund") under the laws of the State of South Dakota. Respondent was the managing member and control person for the Fund.

4. From July 2009 through at least the first week of March 2010, Respondent either advised Wildwood clients to withdraw their money from Wildwood and invest in the Fund, or forged a client's signature to effect the transfer of their funds into the Fund's accounts.

5. On April 10, 2010, the SEC filed a Civil Action Number 10-cv-1207, in the United States District Court of the District of Minnesota alleging Respondent defrauded clients into transferring their money to Investors Income Fund I, LLC ("the Fund") by making false representations concerning the Fund. From July 2009 through March 2010, clients invested more than \$1.1 million with the Fund.

6. In May 2011, Respondent was indicted in Federal Court in Minnesota on five counts of securities fraud, five counts of wire fraud and one count of money laundering associated with her activities involving the Fund.

7. On August 17, 2011, the SEC accepted a final judgment entered by consent in which Respondent is permanently enjoining from further violations of various sections of the Securities Act of 1933, the Exchange Act and the Advisers Act.

8. On February 15, 2012, Respondent pled guilty in Federal Court to one count of wire fraud.

9. On July 5, 2012, Respondent was sentenced to 51 months in prison and ordered to pay restitution of \$618,000.

10. Respondent has engaged in an act, practice or course of business that operates or would operate as a fraud or deceit upon another person in violation of Minn. Stat. § 80A.68.

11. Respondent employed fraudulent, coercive and dishonest practices, and demonstrated untrustworthiness and financial irresponsibility whether or not involving the business of insurance in violation of Minn. Stat. § 60K.43 subd. 1(8).

12. Respondent has further engaged in dishonest or unethical practices involving the business of securities in violation of Minn. Stat. § 80A.67(d)(13).

13. Respondent acknowledges that she has been advised of her rights to a hearing in this matter, to present argument to the Commissioner and to appeal from any adverse determination after a hearing, and Respondent hereby expressly waives those rights. Respondent further acknowledges that she has been represented by legal counsel throughout these proceedings, or has been advised of her right to be represented by legal counsel, which right she hereby waives.

14. Respondent has agreed to informal disposition of this matter without a hearing in this matter as provided under Minn. Stat. § 14.59 (2010) and Minn. R. 1400.5900 (2009).

15. The following Order is in the public interest.

**NOW, THEREFORE, IT IS HEREBY ORDERED**, that pursuant to Minn. Stat. § 80A.67 the securities agent's license of Renee Marie Brown is revoked.

**IT IS FURTHER ORDERED**, that pursuant to Minn. Stat. § 60K.43 subd. 1(8) the insurance producer license of Renee Marie Brown is revoked.

**IT IS FURTHER ORDERED**, that Renee Marie Brown is barred from acting as a securities agent/representative, investment adviser, investment adviser representative, or having any association with any FINRA member firm, SEC registered investment adviser or state licensed investment adviser in any capacity.

**IT IS FURTHER ORDERED**, that pursuant to Minn. Stat. § 45.027 subd. 6, Respondent shall pay to the state of Minnesota a civil penalty of \$25,000.00. Respondent acknowledges that the civil penalty and/or any resulting judgment arising from this Order is non-dischargeable in any bankruptcy proceeding. See 11 U.S.C. 523(a)(7) (2010) (“A discharge under section 727, 1141, 1228(a), 1228(b), or 1328(b) of this title does not discharge an individual debtor from any debt . . . to the extent such debt is for a fine, penalty, or forfeiture payable to and for the benefit of a governmental unit, and is not compensation for actual pecuniary loss, other than a tax penalty . . .”).

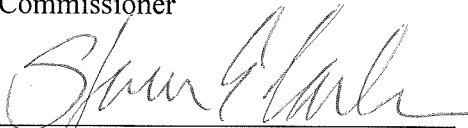
**IT IS FURTHER ORDERED** that pursuant to Minn. Stat. § 16D.17 (2010), the Commissioner may file and enforce the civil penalty imposed by this Order as a judgment against Respondent in district court without further notice or additional proceedings. In addition, pursuant to Minn. Stat. § 16D.13 (2010), Respondent is hereby notified that 30 days after the date of this Consent Order, simple interest computed in accordance with Minn. Stat. § 16D.13, subd. 2 (2010) will begin to accrue on the civil penalty imposed against Respondent.

This Order shall be effective upon signature on behalf of the Commissioner.

Dated: October 13, 2012

MIKE ROTHMAN  
Commissioner

By:

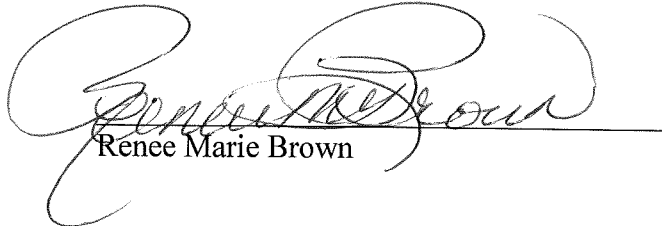


STEVEN E. CARLSON  
Deputy Commissioner

85 Seventh Place East, Suite 500  
Saint Paul, Minnesota 55101  
Telephone: (651) 296-2488

## CONSENT TO ENTRY OF ORDER

The undersigned, Renee Marie Brown, states that she has read the foregoing Consent Order; that she knows and fully understands its contents and effect; that she has been advised of her right to a hearing in this matter; that she has been represented by legal counsel in this matter, or has been advised of her right to be represented by legal counsel; and that she consents to entry of this Order by the Commissioner. It is further understood that this Consent Order constitutes the entire settlement agreement between the parties, there being no other promises or agreements, either express or implied.

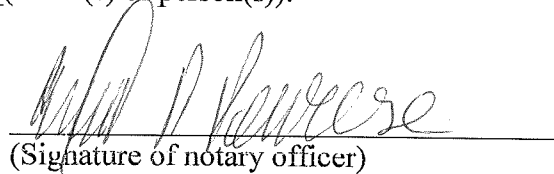
  
Renee Marie Brown

STATE OF MINNESOTA

COUNTY OF Waseca

Signed or attested before me on Sept. 20, 2012 (date)  
by Renee Brown (name(s) of person(s)).

(stamp)

  
(Signature of notary officer)



My Commission expires: Jan 31, 17